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8 ***Attorneys for Plaintiff and the Proposed Class***

9
10 **UNITED STATES DISTRICT COURT**
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12 **NORTHERN DISTRICT OF CALIFORNIA**
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14 **SAN FRANCISCO DIVISION**

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LAWRENCE PALMER, an individual; on
behalf of himself and those similarly situated,

Case No. 3:20-cv-06309-JSC

Judge: Hon. Jacqueline Scott Corley

Plaintiff,
v.
CITIZENS BANK, N.A.; CITIZENS
FINANCIAL GROUP, INC.; FARMERS
GROUP, INC.; FARMERS EXCHANGE;
HSBC BANK, USA, N.A.; DISCOVER
FINANCIAL SERVICES, INC, and DOES 1-
100,

**DECLARATION OF BLAKE J.
LINDEMANN IN SUPPORT OF
PLAINTIFF'S NOTICE OF MOTION AND
MOTION FOR LEAVE TO FILE SECOND
AMENDED CLASS ACTION
COMPLAINT; MEMORANDUM
OF LAW IN SUPPORT THEREOF**

**Date: April 29, 2021
Time: 9:00 a.m.
Courtroom: E - 15th Floor**

Date Removed: September 4, 2020
Date Filed: April 24, 2020

1 I, Blake J. Lindemann, hereby declare under penalty of perjury:

2 1. I submit this declaration in support of Plaintiff's Motion for Leave to File Second
3 Amended Class Action Complaint ("Motion"). I represent the Plaintiff and proposed Class in the
4 above-captioned action. I make this declaration based on my own personal knowledge. If called to do
5 so, I could and would testify to the matters contained herein.

6 2. Plaintiff filed a Class Action Complaint on April 27, 2020 in the Superior Court of
7 California, County of San Francisco.

8 3. Plaintiff filed a First Amended Class Action Complaint ("FAC") on August 19, 2020
9 in the Superior Court of California, County of San Francisco.

10 4. On January 15, 2021, the Court denied Plaintiff's Motion to Remand the Case to the
11 Superior Court of California, County of San Francisco. The original Complaint and the FAC contains
12 allegations concerning certifying a class under the standards of the *California Rules of Civil
13 Procedure*, based on the previous forum of the dispute. Because this case will proceed in the Federal
14 District Court, Plaintiff has made amendments to correct the claims based on the location of the Case.
15 In addition, through discovery, investigation, and based on the same general set of facts, Plaintiff seeks
16 to add one Defendant to the Action, and assert three new causes of action that are predicated on the
17 same general set of facts that have already been pled.

18 5. A continued Case Management Conference is set for April 15, 2021.

19 6. No deadline for amending the pleadings or adding new parties has been set. No
20 scheduling order has been entered in this case.

21 7. Attached hereto as **Exhibit 1** is Plaintiff's proposed Second Amended Class Action
22 Complaint.

23 8. Attached hereto as **Exhibit 2** is a redline version of Plaintiff's proposed Second
24 Amended Class Action Complaint showing the changes made to the First Amended Class Action
25 Complaint.

1 9. The proposed amendments are made in the furtherance of justice and will not delay the
2 proceedings.

3 I declare under penalty of perjury under the laws of the United States that the foregoing is
4 true and correct. Executed this 24th day of March, 2021 at Los Angeles, California.

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6 */s/ Blake J. Lindemann*
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